

# **Exhibit E**

**From:** [Neufeld, Sheryl \(Law\)](#)  
**To:** [Simpson, Kayla](#); [Katherine Haas](#); [Anna Friedberg](#); [Joyce, Kimberly \(Law\)](#); [Debbie Greenberger](#); [Werlwas, Mary Lynne](#); ["Powell, Jeffrey K. \(USANYS\) 4"](#)  
**Cc:** [Jonathan S. Abady](#); [Billingsley, David](#); [Nairuby Beckles](#); [Nunez-NYC](#); [Steve Martin](#); [Guillaume, Melissa](#); [Sana Mayat](#); [Hendy, Cherae](#); [Wolecki, Hilary](#); [Baranchuk, Victoriva](#); [Shechtman, Paul \(DOC\)](#); [Iodice, Ashley \(Law\)](#); [Mooklal, Stefan \(LAW\)](#); ["Eshkenazi, Lara \(USANYS\)"](#); [Maginley-Liddie, Lynelle](#)  
**Subject:** RE: [EXTERNAL] Meet and Confer re Motion for contempt re intake tracking  
**Date:** Wednesday, January 25, 2023 5:58:47 PM

---

Hi all –

Please see the below responses to the questions posed in Kayla's January 19 email.

[REDACTED]

Thanks,

Sheryl



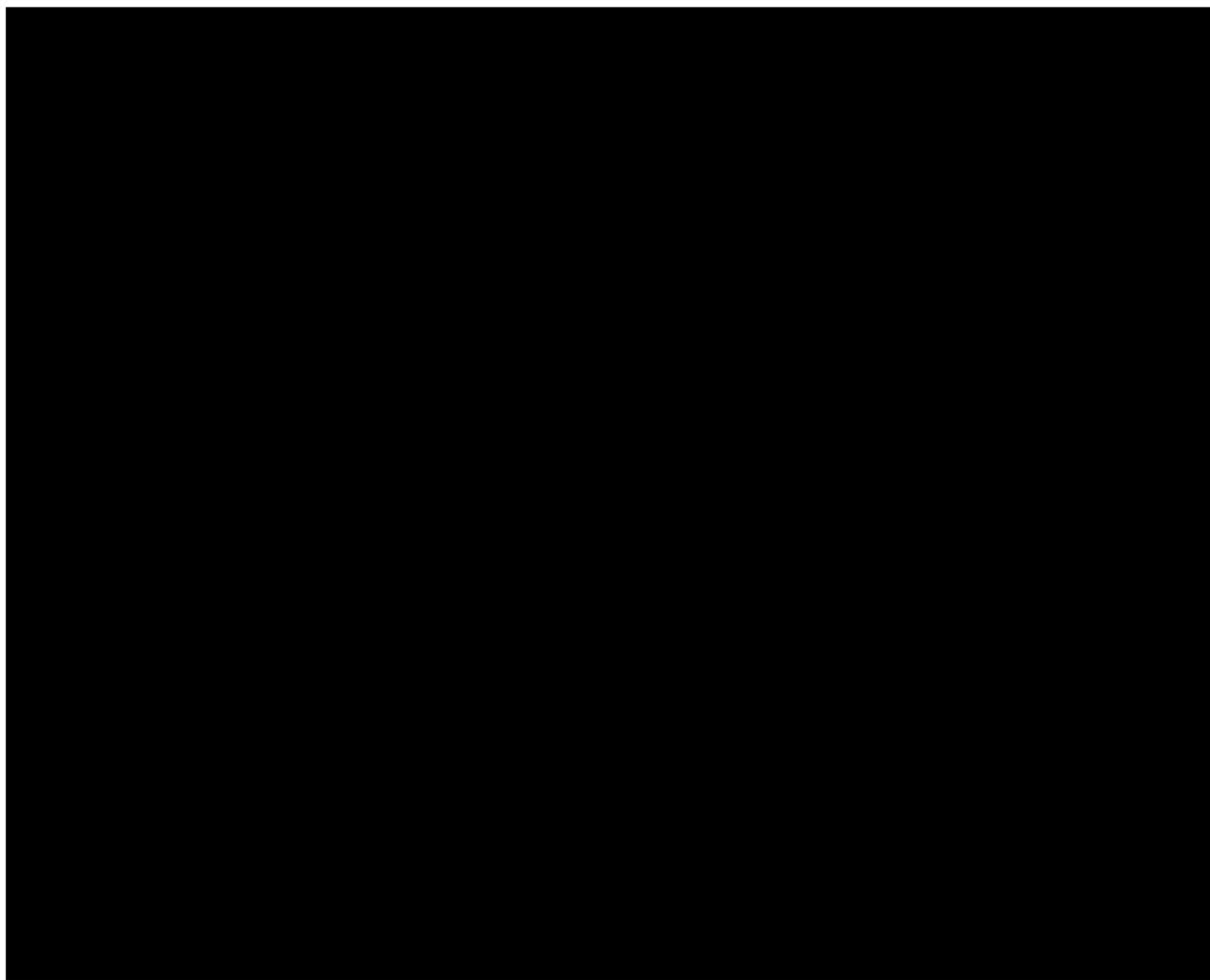
**To:** Neufeld, Sheryl (Law) [REDACTED]; Anna Friedberg [REDACTED];  
Joyce, Kimberly (Law) [REDACTED]; Debbie Greenberger [REDACTED];  
Mary Lynne Werlwas [REDACTED] 'Powell, Jeffrey K. (USANYS) 4'

**Cc:** Jonathan S. Abady [REDACTED]; Kayla Simpson [REDACTED]; David  
Billingsley [REDACTED]; Nairuby Beckles [REDACTED]; Nunez-NYC  
[REDACTED]; Steve Martin [REDACTED]; Guillaume, Melissa  
[REDACTED]; Sana Mayat [REDACTED]; Hendy, Cherae  
[REDACTED]; Wolecki, Hilary [REDACTED]; Baranchuk, Victoriya  
[REDACTED]; Shechtman, Paul (DOC) [REDACTED]  
Iodice, Ashley (Law) [REDACTED]; Mooklal, Stefan (LAW) [REDACTED];  
'Eshkenazi, Lara (USANYS)' [REDACTED]; Maginley-Liddie, Lynelle [REDACTED]  
[REDACTED]

**Subject:** RE: [EXTERNAL] Meet and Confer re Motion for contempt re intake tracking

All,

In advance of our meet and confer tomorrow, we wanted to follow up on a question we had regarding the below email from Sheryl that we didn't get a chance to discuss last week.



[REDACTED]

Thank you,

Katie

---

**From:** Neufeld, Sheryl (Law) [REDACTED]  
**Sent:** Thursday, January 5, 2023 5:10 PM  
**To:** Anna Friedberg [REDACTED]; Joyce, Kimberly (Law) [REDACTED];  
Debbie Greenberger [REDACTED]; Mary Lynne Werlwas [REDACTED]  
[REDACTED]; 'Powell, Jeffrey K. (USANYS) 4' [REDACTED] Katherine Haas [REDACTED]  
[REDACTED]  
**Cc:** Jonathan S. Abady [REDACTED] Kayla Simpson [REDACTED]; David  
Billingsley [REDACTED]; Nairuby Beckles [REDACTED]; Nunez-NYC  
[REDACTED]; Steve Martin [REDACTED]; Guillaume, Melissa  
[REDACTED]; Sana Mayat [REDACTED]; Hendy, Cherae  
[REDACTED]; Wolecki, Hilary [REDACTED]; Baranchuk, Victoriya  
[REDACTED]; Shechtman, Paul (DOC) [REDACTED];  
Iodice, Ashley (Law) [REDACTED]; Mooklal, Stefan (LAW) [REDACTED];  
'Eshkenazi, Lara (USANYS)' [REDACTED]; Maginley-Liddie, Lynelle [REDACTED]  
[REDACTED]  
**Subject:** RE: [EXTERNAL] Meet and Confer re Motion for contempt re intake tracking

You don't often get email from [REDACTED]. [Learn why this is important](#)

I hope you all had an enjoyable holiday and a good start to the new year. [REDACTED]

[REDACTED]

First, so that everyone has them, I'm attaching unredacted copies of the documents that were attached as exhibits to plaintiffs' August 26, 2022 letter.

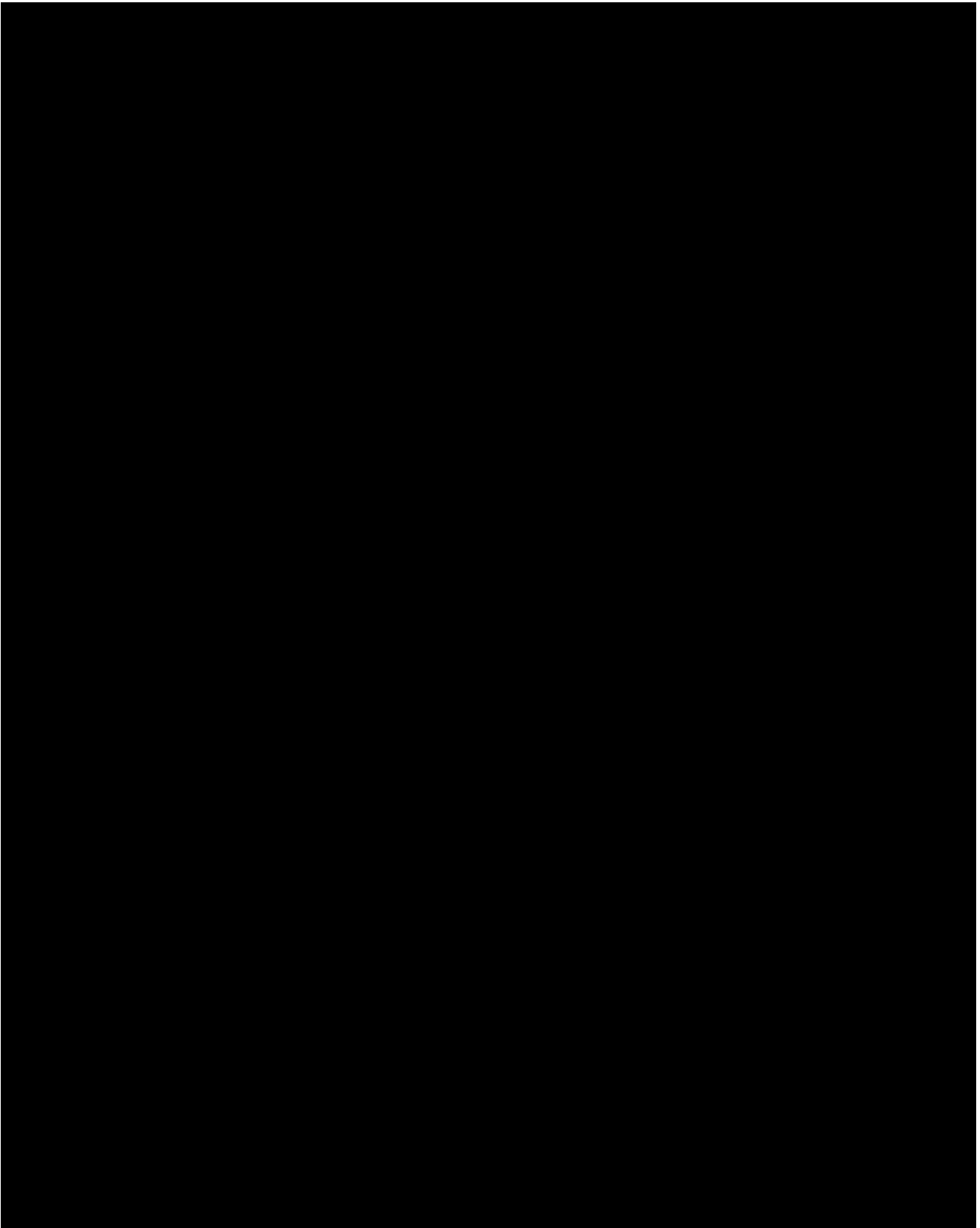
Second, there was a miscommunication and, thus, an error in one of the City's prior statements

[REDACTED]

Finally, as requested below [REDACTED] the City's position [REDACTED]

[REDACTED]

[REDACTED]



Thanks,

Sheryl

Sheryl R. Neufeld

Chief Assistant for  
Regulatory Law and Policy  
New York City Law Department  
100 Church Street  
New York, New York 10007  
[REDACTED]

---

**From:** Anna Friedberg [REDACTED]  
**Sent:** Wednesday, December 14, 2022 12:06 PM  
**To:** Joyce, Kimberly (Law) [REDACTED]; 'Debbie Greenberger'  
[REDACTED]; Werlwas, Mary Lynne [REDACTED] 'Powell, Jeffrey  
K. (USANYS) 4' [REDACTED] Katherine Haas [REDACTED]  
**Cc:** Jonathan S. Abady [REDACTED] Simpson, Kayla [REDACTED];  
Billingsley, David [REDACTED]; Nairuby Beckles [REDACTED]; Nunez-  
NYC [REDACTED] Steve Martin [REDACTED]; Guillaume, Melissa  
[REDACTED] Sana Mayat [REDACTED]; Hendy, Cherae  
[REDACTED]; Wolecki, Hilary [REDACTED]; Baranchuk, Victoriya  
[REDACTED]; Shechtman, Paul (DOC) [REDACTED]  
Iodice, Ashley (Law) [REDACTED]; Neufeld, Sheryl (Law) [REDACTED];  
Mooklal, Stefan (LAW) [REDACTED]; 'Eshkenazi, Lara (USANYS)'  
[REDACTED] Maginley-Liddie, Lynelle [REDACTED]  
**Subject:** RE: [EXTERNAL] Meet and Confer re Motion for contempt re intake tracking

All,

The Monitoring Team is available on the afternoon of January 11<sup>th</sup>.

[REDACTED]

Thanks,  
Anna

— · — · — · — · — · — · —  
Anna E. Friedberg

Tillid - President

178 Columbus Avenue, [REDACTED]  
New York, NY 10023-9998

---

**From:** Joyce, Kimberly (Law) [REDACTED]  
**Sent:** Wednesday, December 14, 2022 11:24 AM  
**To:** 'Debbie Greenberger' [REDACTED]; Werlwas, Mary Lynne  
[REDACTED]; 'Powell, Jeffrey K. (USANYS) 4' [REDACTED]; Katherine  
Haas [REDACTED]  
**Cc:** Jonathan S. Abady [REDACTED]; Simpson, Kayla [REDACTED];  
Billingsley, David [REDACTED]; Nairuby Beckles [REDACTED] Nunez-  
NYC [REDACTED]; Steve Martin [REDACTED] Guillaume, Melissa  
[REDACTED]; Sana Mayat [REDACTED]; Anna Friedberg  
[REDACTED] Hendy, Cherae [REDACTED]; Wolecki, Hilary  
[REDACTED]; Baranchuk, Victoriya [REDACTED];  
Shechtman, Paul (DOC) [REDACTED]; Iodice, Ashley (Law)  
[REDACTED]; Neufeld, Sheryl (Law) [REDACTED]; Mooklal, Stefan (LAW)  
[REDACTED]; 'Eshkenazi, Lara (USANYS)' [REDACTED]; Maginley-Liddie,  
Lynelle [REDACTED]  
**Subject:** RE: [EXTERNAL] Meet and Confer re Motion for contempt re intake tracking

Debbie,

Law and DOC can meet the afternoon of 1/11 but we have a hard stop at 5:30. What time would you like to start and I'll send an invite setting aside 90 minutes, since we generally tend to run over the hour.

Thanks,  
Kim

---

**From:** Debbie Greenberger [REDACTED]  
**Sent:** Wednesday, December 14, 2022 9:56 AM  
**To:** Werlwas, Mary Lynne [REDACTED]; Joyce, Kimberly (Law)  
[REDACTED]; 'Powell, Jeffrey K. (USANYS) 4' [REDACTED]; Katherine Haas  
[REDACTED]  
**Cc:** Jonathan S. Abady [REDACTED]; Simpson, Kayla [REDACTED];  
Billingsley, David [REDACTED]; Nairuby Beckles [REDACTED]; 'Nunez-  
NYC' [REDACTED]; Steve Martin [REDACTED]; Guillaume, Melissa



[REDACTED]; Sana Mayat [REDACTED]; Anna Friedberg  
[REDACTED]; Hendy, Cherae [REDACTED]; Wolecki, Hilary  
[REDACTED]; Baranchuk, Victoriya [REDACTED];  
Shechtman, Paul (DOC) [REDACTED]; Iodice, Ashley (Law)  
[REDACTED]; Neufeld, Sheryl (Law) [REDACTED]; Mooklal, Stefan (LAW)  
[REDACTED]; 'Eshkenazi, Lara (USANYS)' [REDACTED]; Maginley-Liddie,  
Lynelle [REDACTED]

**Subject:** [EXTERNAL] Meet and Confer re Motion for contempt re intake tracking

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Forward suspect email to [REDACTED] as an attachment (Click the More button, then forward as attachment).

Kim and all,

[REDACTED]  
[REDACTED] we would like to get the meet-and-confer on the calendar. We would suggest the afternoon of 1/11. Is there a time that afternoon that works for the City? DOJ—hope that works for you as well.

Best  
Debbie

Debbie Greenberger  
she/her  
Partner  
Emery Celli Brinckerhoff Abady Ward & Maazel LLP  
600 Fifth Ave at Rockefeller Plaza, 10th Floor  
New York, NY 10020

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

---

**From:** Mary Lynne Werlwas [REDACTED]  
**Sent:** Wednesday, December 14, 2022 9:54 AM  
**To:** Joyce, Kimberly (Law) [REDACTED]; Debbie Greenberger  
[REDACTED]; 'Powell, Jeffrey K. (USANYS) 4' [REDACTED]  
Katherine Haas [REDACTED]  
**Cc:** Jonathan S. Abady [REDACTED]; Kayla Simpson [REDACTED]; David  
Billingsley [REDACTED]; Nairuby Beckles [REDACTED]; 'Nunez-NYC'  
[REDACTED]; Steve Martin [REDACTED]; Guillaume, Melissa  
[REDACTED]; Sana Mayat [REDACTED]; Anna Friedberg  
[REDACTED]; Hendy, Cherae [REDACTED]; Wolecki, Hilary  
[REDACTED]; Baranchuk, Victoriya [REDACTED];

Shechtman, Paul (DOC) [REDACTED]; Iodice, Ashley (Law)  
[REDACTED]; Neufeld, Sheryl (Law) [REDACTED]; Mooklal, Stefan (LAW)  
[REDACTED]; 'Eshkenazi, Lara (USANYS)' [REDACTED]; Maginley-Liddie,  
Lynelle [REDACTED]  
**Subject:** [EXTERNAL] Re: Motion for contempt re intake tracking

**This Message originated outside your organization.**

---

Hi Kim,  
It is me, Katherine Haas and Natalie Pacht (paralegal), all from LAS. Let me know what time to meet  
you and where. Thanks.

Mary Lynne

**Mary Lynne Werlwas**  
Director  
Prisoners' Rights Project  
Tel: [REDACTED]  
she/her

---

**From:** Joyce, Kimberly (Law) [REDACTED]  
**Sent:** Tuesday, December 13, 2022 5:02 PM  
**To:** Debbie Greenberger [REDACTED]; 'Powell, Jeffrey K. (USANYS) 4'  
[REDACTED]; Katherine Haas [REDACTED]; Mary Lynne Werlwas  
[REDACTED]  
**Cc:** Jonathan S. Abady [REDACTED]; Kayla Simpson [REDACTED] David  
Billingsley [REDACTED] Nairuby Beckles [REDACTED]; 'Nunez-NYC'  
[REDACTED] Steve Martin [REDACTED]; Guillaume, Melissa  
[REDACTED]; Sana Mayat [REDACTED] Anna Friedberg  
[REDACTED]; Hendy, Cherae [REDACTED]; Wolecki, Hilary  
[REDACTED]; Baranchuk, Victoriya [REDACTED];  
Shechtman, Paul (DOC) [REDACTED]; Iodice, Ashley (Law)  
[REDACTED]; Neufeld, Sheryl (Law) [REDACTED]; Mooklal, Stefan (LAW)  
[REDACTED]; 'Eshkenazi, Lara (USANYS)' [REDACTED]; Maginley-Liddie,  
Lynelle [REDACTED]  
**Subject:** Re: Motion for contempt re intake tracking

Mary Lynne and Debbie,

Can you let me know by tomorrow morning who, if anyone, will be attending Friday's tour from LAS  
and ECBA? SDNY is not coming.

Thank you,  
Kim

██████████

[REDACTED]

[REDACTED]

---

**From:** Joyce, Kimberly (Law) [REDACTED]

**Sent:** Friday, December 9, 2022 5:32 PM

**To:** Debbie Greenberger [REDACTED]; 'Powell, Jeffrey K. (USANYS) 4'

[REDACTED]; Katherine Haas [REDACTED]

**Cc:** Jonathan S. Abady [REDACTED]; Kayla Simpson [REDACTED]; David

Billingsley [REDACTED]; Nairuby Beckles [REDACTED]; 'Nunez-NYC'

[REDACTED]; Steve Martin [REDACTED]; Guillaume, Melissa

[REDACTED]; Mary Lynne Werlwas [REDACTED]; Sana Mayat

[REDACTED] Anna Friedberg [REDACTED]; Hendy, Cherae

[REDACTED]; Wolecki, Hilary [REDACTED]; Baranchuk, Victoriya

[REDACTED]; Shechtman, Paul (DOC) [REDACTED];

Iodice, Ashley (Law) [REDACTED]; Neufeld, Sheryl (Law) [REDACTED];

Mooklal, Stefan (LAW) [REDACTED] 'Eshkenazi, Lara (USANYS)'

[REDACTED]; Maginley-Liddie, Lynelle [REDACTED];

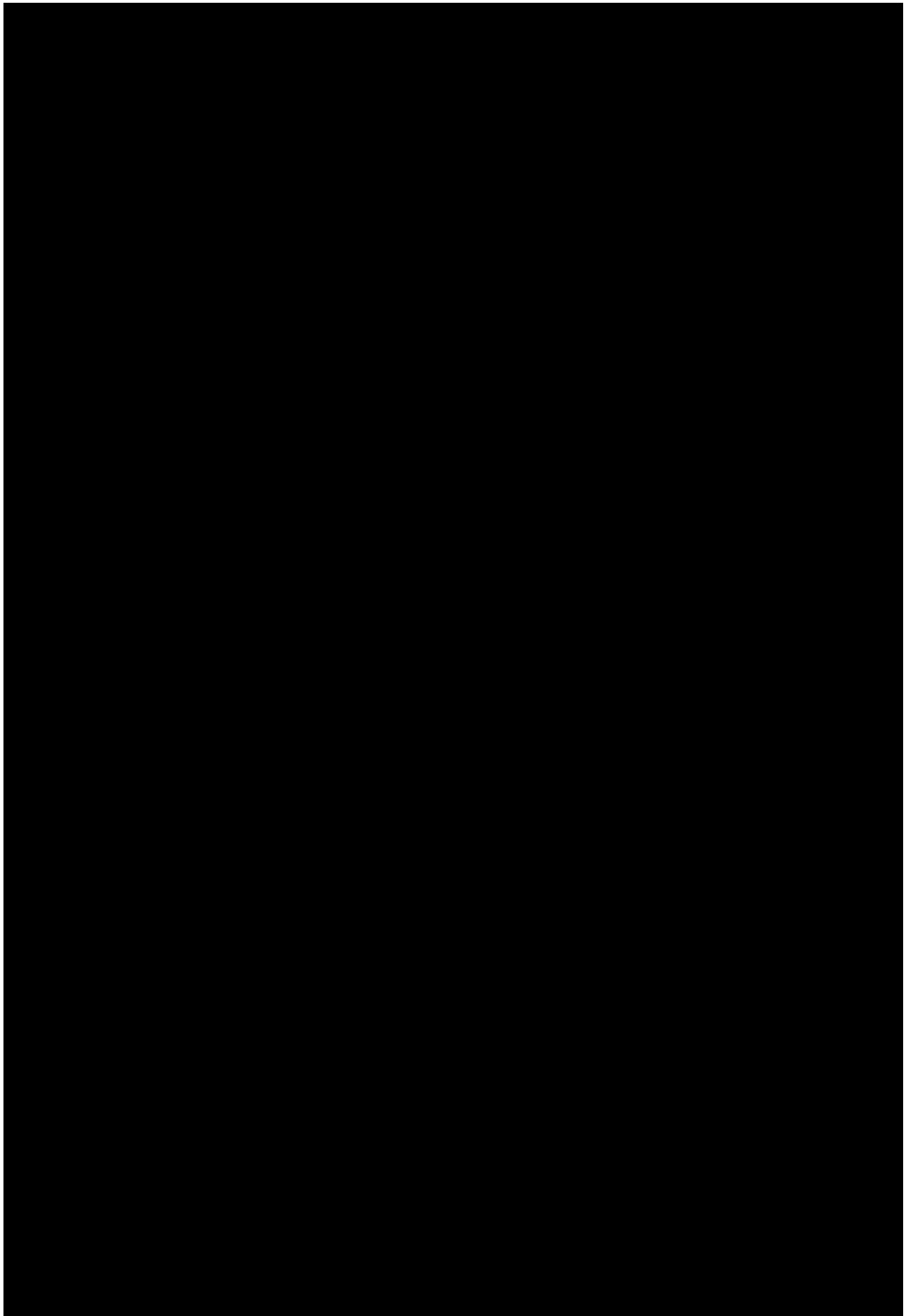
Nairuby Beckles [REDACTED]

**Subject:** RE: [EXTERNAL] Motion for contempt re intake tracking

Debbie,

Below/attached is our position for inclusion in the letter:

[REDACTED]



[REDACTED]

---

**From:** Debbie Greenberger [REDACTED]  
**Sent:** Friday, December 9, 2022 11:49 AM  
**To:** Joyce, Kimberly (Law) [REDACTED] 'Powell, Jeffrey K. (USANYS) 4'  
[REDACTED] Katherine Haas' [REDACTED]  
**Cc:** Jonathan S. Abady [REDACTED] Simpson, Kayla [REDACTED]  
Billingsley, David [REDACTED]; Nairuby Beckles [REDACTED]; 'Nunez-  
NYC' [REDACTED]; 'Steve Martin' [REDACTED]; Guillaume, Melissa  
[REDACTED] Werlwas, Mary Lynne [REDACTED] Sana Mayat  
[REDACTED]; 'Anna Friedberg' [REDACTED]; Hendy, Cherae  
[REDACTED] Wolecki, Hilary [REDACTED]; Baranchuk, Victoriya  
[REDACTED]; Shechtman, Paul (DOC) [REDACTED]  
Iodice, Ashley (Law) [REDACTED]; Neufeld, Sheryl (Law) [REDACTED];  
Mooklal, Stefan (LAW) [REDACTED]; 'Eshkenazi, Lara (USANYS)'  
[REDACTED] Maginley-Liddie, Lynelle [REDACTED];  
Nairuby Beckles [REDACTED]  
**Subject:** RE: [EXTERNAL] Motion for contempt re intake tracking

Kim,

We appreciate the additional information you provided below and are reviewing and will circle back with additional questions. We can also confirm 12/16 for the EMTC intake tour. As to the meet-and-confer and the information DOC has provided, [REDACTED]

[REDACTED]

Please send us your portion of the status letter when you get a chance.

Best  
Debbie

Debbie Greenberger  
she/her  
Partner  
Emery Celli Brinckerhoff Abady Ward & Maazel LLP  
600 Fifth Ave at Rockefeller Plaza, 10th Floor  
New York, NY 10020

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

---

**From:** Joyce, Kimberly (Law) [REDACTED]  
**Sent:** Thursday, December 8, 2022 1:36 PM  
**To:** Debbie Greenberger [REDACTED]; 'Powell, Jeffrey K. (USANYS) 4'  
[REDACTED]; 'Katherine Haas' [REDACTED]  
**Cc:** Jonathan S. Abady [REDACTED]; Simpson, Kayla [REDACTED]  
Billingsley, David [REDACTED]; Nairuby Beckles [REDACTED]; 'Nunez-  
NYC' [REDACTED]; 'Steve Martin' [REDACTED]; Guillaume, Melissa  
[REDACTED]; Werlwas, Mary Lynne [REDACTED]; Sana Mayat  
[REDACTED]; 'Anna Friedberg' [REDACTED]; Hendy, Cherae  
[REDACTED]; Wolecki, Hilary [REDACTED]; Baranchuk, Victoriya  
[REDACTED]; Shechtman, Paul (DOC) [REDACTED];  
Iodice, Ashley (Law) [REDACTED]; Neufeld, Sheryl (Law) [REDACTED];  
Mooklal, Stefan (LAW) [REDACTED]; 'Eshkenazi, Lara (USANYS)'  
[REDACTED]; Maginley-Liddie, Lynelle [REDACTED];  
Nairuby Beckles [REDACTED]  
**Subject:** RE: [EXTERNAL] Motion for contempt re intake tracking

**This Message originated outside your organization.**

---

Debbie,

We'll send you our response for the status letter regarding your motion request by tomorrow morning.

[REDACTED]

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]



[REDACTED]

Thank you,  
Kim

Kimberly Joyce  
Senior Counsel  
General Litigation Division  
New York City Law Department  
100 Church Street, Rm. 2-191  
New York, NY 10007

[REDACTED]  
[REDACTED]

---

**From:** Debbie Greenberger [REDACTED]  
**Sent:** Thursday, December 8, 2022 12:29 PM  
**To:** Joyce, Kimberly (Law) [REDACTED]; 'Powell, Jeffrey K. (USANYS) 4'  
[REDACTED]; 'Katherine Haas' [REDACTED]  
**Cc:** Jonathan S. Abady [REDACTED] Simpson, Kayla [REDACTED]  
Billingsley, David [REDACTED] Nairuby Beckles [REDACTED] 'Nunez-  
NYC' [REDACTED] 'Steve Martin' [REDACTED] Guillaume, Melissa  
[REDACTED] Werlwas, Mary Lynne [REDACTED] Sana Mayat  
[REDACTED]; 'Anna Friedberg' [REDACTED]; Hendy, Cherae  
[REDACTED]; Wolecki, Hilary [REDACTED] Baranchuk, Victoriya  
[REDACTED]; Shechtman, Paul (DOC) [REDACTED];  
Iodice, Ashley (Law) [REDACTED]; Neufeld, Sheryl (Law) [REDACTED];  
Mooklal, Stefan (LAW) [REDACTED] 'Eshkenazi, Lara (USANYS)'  
[REDACTED]; Maginley-Liddie, Lynelle [REDACTED];  
Nairuby Beckles [REDACTED]  
**Subject:** [EXTERNAL] Motion for contempt re intake tracking

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Forward suspect email to [REDACTED] as an attachment (Click the More button, then forward as attachment).

Kim and all,

As you know, the Court asked us to submit a joint letter by tomorrow concerning Plaintiff's anticipated motion for contempt concerning the intake overstay issue. [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED] Please let us know the City's position that we should share with the Court in tomorrow's letter and what date you will seek to respond to our motion.

Best  
Debbie

Debbie Greenberger  
she/her  
Partner  
Emery Celli Brinckerhoff Abady Ward & Maazel LLP  
600 Fifth Ave at Rockefeller Plaza, 10th Floor  
New York, NY 10020

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]